

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

FILED  
RICHARD W. NAGEL  
CLERK OF COURT

## UNITED STATES DISTRICT COURT

2020 JUN 12 PM 3:07

for the

U.S. DISTRICT COURT  
SOUTHERN DIST. OHIO  
EAST. DIV. COLUMBUS

District of

Division

Case No.

2 2 0 C V 3 0 3 5

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☐ No

\*

Judge Watson,  
MAGISTRATE JUDGE VASCURAMariellen Calloway, Tyshajuan Calloway,  
Demetrais Miller, The La rue Private fundraising club,  
La Rue Banquet Facility llc,

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

City of Columbus Police Vice squad, Building and  
Zoning, Bill Sperlazza

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## COMPLAINT FOR A CIVIL CASE

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Mariellen Calloway
Street Address	1933 E Dublin grandville rd #234
City and County	Columbus Franklin
State and Zip Code	Ohio 43229
Telephone Number	772-979-0559
E-mail Address	nicolemills3112@gmail.com

Name	<u>Tyshajuan Calloway</u>
Street Address	<u>1933 E. Dublin Grandville rd #234</u>
City and County	<u>Columbus Franklin</u>
State and Zip Code	<u>Ohio 43229</u>
Telephone Number	<u>(614) 214-3080</u>

Name	<u>Demetrais Miller</u>
Street Address	<u>1933 E. Dublin grandville rd #234</u>
City and County	<u>Columbus Franklin</u>
State and Zip Code	<u>Ohio 43229</u>
Telephone Number	<u>(772) 979-0559</u>
Email	<u>nicolemills3112@gmail.com</u>

**B.****The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

## Defendant No. 1

Name	<u>The City of Columbus vice squad</u>
Job or Title ( <i>if known</i> )/	<u>To protect and serve</u>
Street Address	<u>120 Marconi Blvd</u>
City and County	<u>Columbus Franklin</u>
State and Zip Code	<u>Ohio 43215</u>
Telephone Number	<u>(614) 645-4545</u>
E-mail Address ( <i>if known</i> )	<u>columbuspolice.org</u>

## Defendant No. 2

Name	<u>Detective Steven Rosser</u>
Job or Title ( <i>if known</i> )	<u>Columbus Police officer</u>
Street Address	<u>120 Marconi Blvd</u>
City and County	<u>Columbus Franklin</u>
State and Zip Code	<u>43215</u>
Telephone Number	<u>(614) 645-4545</u>
E-mail Address ( <i>if known</i> )	<u></u>

## Defendant No. 3

Name	The City of Columbus Building and Zoning
Job or Title <i>(if known)</i>	building plans
Street Address	111 N Front St
City and County	Columbus Franklin
State and Zip Code	Ohio 43215
Telephone Number	(614) 645-7433
E-mail Address <i>(if known)</i>	

## Defendant No. 4

Name	Bill sperlazza ( City prosecutor)
Job or Title <i>(if known)</i>	Prosecutor
Street Address	373 S. high street
City and County	Columbus Franklin
State and Zip Code	Ohio 43215
Telephone Number	614-525-3555
E-mail Address <i>(if known)</i>	

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question \*



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

## City Police Corruption

### B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) La Rue Privat fundraising club, is a citizen of the  
State of (name) \_\_\_\_\_.

b. If the plaintiff is a corporation

The plaintiff, (name) The La Rue Banquet Facility llc,, is incorporated  
under the laws of the State of (name) Ohio,  
and has its principal place of business in the State of (name)  
Ohio.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of  
the State of (name) \_\_\_\_\_. Or is a citizen of  
(foreign nation) \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under  
the laws of the State of (name) \_\_\_\_\_, and has its  
principal place of business in the State of (name) \_\_\_\_\_.  
Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,  
and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at



stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):

### III. Statement of Claim

1-30-2015 The “Columbus vice unit issued a warrant for La Rue Banquet facility and said that at one of the rented banquet events someone sold a shot of liquor to an undercover”. The charge of “keeper of a place where liquor is being sold is a misdemeanor. The warrant failed to list “La Rue private fundraising club which was locked when officer Steven Rosser broke down the door and took liquor from locked cabinets. Custom point of sale equipment for La Rue private fundraising club was confiscated without the proper warrants. Under Ohio law the proper entities have to be reported in any warrant presented before search and seizure. “Officer Rosser and the Columbus vice unit broke into the Newly City of Columbus inspired La Rue private fundraising club”. Officer Rosser broke down doors to “locked cabinets where liquor was being stored from a previous wedding reception and made it to look like La Rue Banquet Facility had liquor sales going on at that particular event. Mariellen Calloway Demetrais Miller, Tyshajuan Calloway, Head of Security Sir Peagues was arrested for the misdemeanors and taken downtown only to be questioned about a murder.\*It was found out that the Church next to La Rue Banquet is owned by a Columbus police officer/pastor whom was working the morning his nephew was killed outside Abc liquor in 12/. “Unfortunately The Columbus Police officer pastor found his nephew Milton Gregory dead with gun shot wounds, thus was used for Officer Steven Rosser to say the murder happened at La Rue using the mans death to push a corrupt agenda./ The La Rue Banquet Facility wasn’t even read there rights. Officer “Steven Rosser told Mariellen to her face that he didn’t like her”. Officer Rosser placed a fancy fur coat/Alligator shoes purchased from a fellow pastor at Royal Collection in the 43229 area on 161 Dublin Granville rd in Columbus, OH. Officer Steven Rosser made minister Demetrais Miller look like a pimp for the News cameras by walking them out for the News cameras to portray that Demetrais and Mariellen were pimps. Prostitution was mentioned by all News media for a week to push Bill Sperlazza’s “Nuisance abatement propaganda”. City attorney Bill Sperlazza boarded The La Rue banquet facility up for months bankrupting the family. The La Rue Banquet facilities lawyer Omar Tarrazzi found fake/construed reports stating people being caught with drugs leaving La Rue construed by Columbus police officers. Throinvestigations We cannot speak of at the moment officer Rosser and The La Rue banquets competition Baba Happy place forged a mafia like relationship which aided the shutting down/Fake reports of several other businesses(documented). The investigations revealed Officer Steven Rosser had patrons in place inside the La Rue Banquet facility with drugs and guns that he previously had run ins or were using as informants on 01-30-2020 (Documented) inside La Rue Banquet to beef up to the media we were a nuisance. After the La Rue Banquet notified City prosecutor “Bill Sperlazza of the false reports and La Rue Private Fundraising club not being on the warrant; bill notified Officer Steven Rosser and the next day officer Steven Rosser Called Mariellen Calloway through Facebook and mentioned that “If she didn’t stop her investigations he would become a permanent part of her life forever.” A fired bartender from BaBa happy family reached out to Mariellen Calloway through Facebook and sent her a picture of a guy named Steven Rosser who had several meetings with Baba Happy family banquet to shut his competition down; The La Rue Banquet Facility. The bartender mentioned Officer Steven Rosser having relations with a young black stripper and doing cocaine off the bar.(Documented) The bartender mentioned that fired from La Rue Banquet facility Dj and mc juju worked for Officer Rosser and Baba and were used by Officer Rosser to create turmoil within the business, which is why they were fired. “Officer Steven Rosser informed Dj Copastetic to promote on facebook that a murder happen at La Rue”. Dj copastetic recorded phone conversation to Demetrais Miller mentioned officer Rosser always pursuing Dj Copestetic to find information on other bars and banquet halls. A month after Officer Rosser threatened Mariellen Calloway a undercover police officer whos alias was \_\_\_\_\_ became a permanent part

of the La Rue Banquets Facility owners lives. Full investigations were done by gov agencies and information obtained is for trial purposes. "Over 80 individuals and some officers conducted private investigations over the last 3 years to help The La Rue Banquet get to the bottom of things that The United States agency already knew about". "Lawyer Omar Tarrazi has all investigation documentation proof that members of the Columbus Police vice unit tapped La rue owners phones and put an undercover officer whom called La Rue Banquet facility owners at least 3-5 times a week and even invited the owners to a known undercover police hangout called "Buckeye Crazy on 161 dublin Granville rd. Officer "Steven Rosser placed a

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#### IV. Relief

We feel that we were targeted for Bill sperlazzas "Nuisance abatement law. We seek 6-million dollars its been 5 years since we lost our life savings behind The Columbus Police false reports and agendas. Demetrais miller has had numerous documented nervous " breakdowns and is currently taking medication for paranoia. We feel deprived of a lucrative business that was set to create "**Generational wealth**"and provide private school to the Miller Children. We were **locked in to our building at 380k for purchase** and considering inflation of the realestate market we would have a million dollar building with the upgrades we were doing. Tyshajuan Calloway should recieve 2-million Marielllen Calloway should recieve 2-milllion and Demetrais Miller should recieve 2-million.

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#### V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

##### A. For Parties Without an Attorney

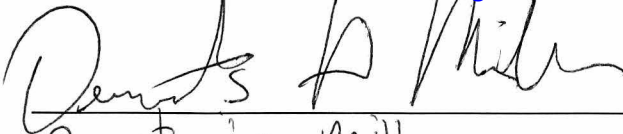
I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

6/9/2020

Signature of Plaintiff

Printed Name of Plaintiff

  
Demetris Miller

**B. For Attorneys**

Date of signing:

6/9/2020

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

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Signature of Plaintiff

Mariellen Calloway

Printed Name of Plaintiff

Mariellen Calloway

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

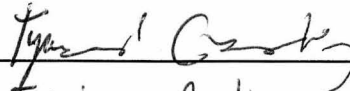
Telephone Number

E-mail Address



Signature of Plaintiff

Printed Name of Plaintiff

  
Tyshawn Embury

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

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